

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VERMONT MUTUAL INSURANCE COMPANY)	CIVIL ACTION
as subrogee of TIMOTHY D. STEIN and)	
WAYNE ROLF,)	NO. 05-10307 JLT
Plaintiff,)	
)	
v.)	
)	AFFIDAVIT OF
DAVID'S FLOOR SERVICE, INC.,)	JAMES P. CULLEN, ESQUIRE
)	<i>PRO HAC VICE</i>
and)	
)	
MIN DANG, d/b/a)	
DAVID'S FLOOR SERVICE,)	JURY TRIAL DEMANDED
)	
)	
Defendants.)	

I, JAMES P. CULLEN, JR., ESQUIRE, being duly sworn, depose and say:

1. I am a resident of the State of New Jersey and a Senior Member of the law firm of Cozen O'Connor, located at 1900 Market Street, Philadelphia, Pennsylvania.

2. I am duly licensed and admitted to practice law by the Commonwealth of Pennsylvania, have an Attorney Identification No. 69745. [A copy of my Certificate of Good Standing is annexed hereto].

3. I am a member in good standing of the Bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the United States District Courts for the Eastern District of Pennsylvania, Middle District of Pennsylvania, and District of New Jersey; I am also duly admitted to the United States Court of Appeals for the Third and Seventh Circuits.

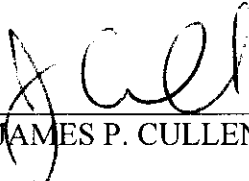
4. There are no disciplinary proceeding or criminal charges instituted against me in the Commonwealth of Pennsylvania or any other state.

5. An established attorney-client relationship exists, and my client has specifically requested that I represent its interest in this matter.

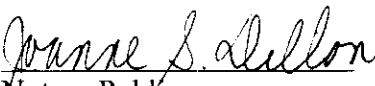
6. The nature of this action involves legal and factual issues pertaining to fire and property damage litigation. I have handled these types of cases in the past and have developed an expertise in these matters.

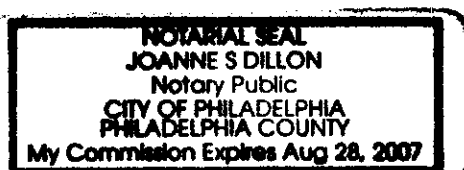
7. If the Court shall allow my Motion to Appear *pro hac vice* in the above-captioned matter, I will continue to represent my client in this proceeding until the final determination hereof and with reference to all matters, incidents, or proceedings, I agree that I shall be subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court and the Bar of the Commonwealth of Massachusetts in all respects, as if I were a regularly admitted and licensed member.

8. I am associated with Patrick J. Loftus, III, Esquire, an attorney who is duly and legally admitted to practice in the Commonwealth of Massachusetts, and upon whom service may be had in all matters connected with the above-captioned case and any disciplinary matter arising out of same, with the same effect as if personally made on me.


JAMES P. CULLEN, JR., ESQUIRE

Sworn to and subscribed
before me this 8 day
of April, 2005.


Notary Public





Supreme Court of Pennsylvania

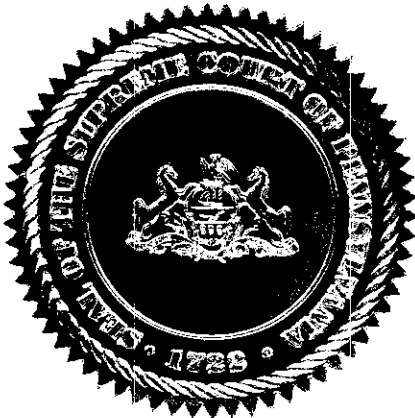
CERTIFICATE OF GOOD STANDING

James P. Cullen, Jr., Esq.

DATE OF ADMISSION

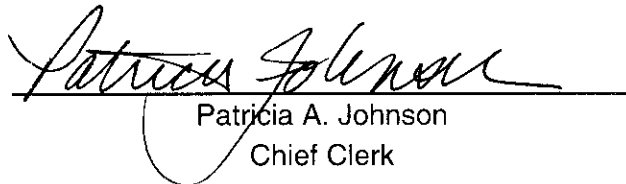
December 8, 1993

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 6, 2005


Patricia A. Johnson
Chief Clerk